

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF: BUTLER

Magisterial District Number: 50-3-04

MDJ: Hon. Judge David Kovach

Address: 9028 Marshall Road  
Cranberry Township, PA 16066

Telephone: (724)772-1717



POLICE CRIMINAL COMPLAINT  
COMMONWEALTH OF PENNSYLVANIA  
VS.

DEFENDANT:

(NAME and ADDRESS):

CORRINA

DAWN

HOGGARD

First Name

Middle Name

Last Name

Gen

2526 Brandt School Road  
Wexford, PA 15090

NCIC Extradition Code Type

- ☒ 1-Felony Full ☐ 5-Felony Pending Extradition ☐ C-Misdemeanor Surrounding States ☐ Distance: \_\_\_\_\_  
☐ 2-Felony Limited ☐ 6-Felony Pending Extradition Determ. ☐ D-Misdemeanor No Extradition  
☐ 3-Felony Surrounding States ☐ A-Misdemeanor Full ☐ E-Misdemeanor Pending Extradition  
☐ 4-Felony No Extradition ☐ B-Misdemeanor Limited ☐ F-Misdemeanor Pending Extradition

DEFENDANT IDENTIFICATION INFORMATION

Docket Number	Date Filed / /	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0080	Request Lab Services? <input type="checkbox"/> YES <input type="checkbox"/> NO
GENDER <input type="checkbox"/> Male <input checked="" type="checkbox"/> Female	DOB 03/08/1974	POB	Add'l DOB / /	Co-Defendant(s) <input type="checkbox"/>
First Name AKA CORRINA		Middle Name DAWN	Last Name GRIFFITH	Gen.
RACE <input checked="" type="checkbox"/> White <input type="checkbox"/> Asian <input type="checkbox"/> Black <input type="checkbox"/> Native American <input type="checkbox"/> Unknown	ETHNICITY <input type="checkbox"/> Hispanic <input type="checkbox"/> Non-Hispanic <input type="checkbox"/> Unknown			
Hair Color <input type="checkbox"/> GRY (Gray) <input type="checkbox"/> RED (Red/Aubn.) <input type="checkbox"/> SDY (Sandy) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> PLE (Purple) <input checked="" type="checkbox"/> BRO (Brown) <input type="checkbox"/> BLK (Black) <input type="checkbox"/> ONG (Orange) <input type="checkbox"/> WHI (White) <input type="checkbox"/> XXX (Unk./Bald) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> BLN (Blonde / Strawberry)				
Eye Color <input type="checkbox"/> BLK (Black) <input type="checkbox"/> BLU (Blue) <input type="checkbox"/> BRO (Brown) <input type="checkbox"/> GRN (Green) <input type="checkbox"/> GRY (Gray) <input checked="" type="checkbox"/> HAZ (Hazel) <input type="checkbox"/> MAR (Maroon) <input type="checkbox"/> PNK (Pink) <input type="checkbox"/> MUL (Multicolored) <input type="checkbox"/> XXX (Unknown)				
DNA <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DNA Location	WEIGHT (lbs.)		
FBI Number D3ALWHPA5	MNU Number	325		
Defendant Fingerprinted <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Ft. HEIGHT In.			
Fingerprint Classification:	5			7

DEFENDANT VEHICLE INFORMATION

Plate #	State	Haz mat <input type="checkbox"/>	Registration Sticker (MM/YY) /	Comm'l Veh. Ind. <input type="checkbox"/>	School Veh. <input type="checkbox"/>	Oth. NCIC Veh. Code	Reg. same as Def. <input type="checkbox"/>
VIN	Year	Make	Model	Style	Color		

Office of the attorney for the Commonwealth ☐ Approved ☐ Disapproved because: \_\_\_\_\_

(The attorney for the Commonwealth may require that the complaint, arrest warrant affidavit, or both be approved by the attorney for the Commonwealth prior to filing. See Pa.R.Crim.P. 507).

KARA COTTER/MARNIE SHEEHAN-BALCHON

(Name of the attorney for the Commonwealth)

(Signature of the attorney for the Commonwealth)

(Date)

I, SA DAVID A. DALCAMO/ NA WILLIAM BROWN

(Name of the Affiant)

457/643

(PSP/MP/ETC -Assigned Affiant ID Number & Badge #)

of Pennsylvania Office of Attorney General

(Identify Department or Agency Represented and Political Subdivision)

PA0222400

(Police Agency ORI Number)

do hereby state: (check appropriate box)

1. ☒ I accuse the above named defendant who lives at the address set forth above  
☐ I accuse the defendant whose name is unknown to me but who is described as \_\_\_\_\_

☐ I accuse the defendant whose name and popular designation or nickname are unknown to me and whom I have  
therefore designated as John Doe or Jane Doe

with violating the penal laws of the Commonwealth of Pennsylvania at [212] 1 St. Francis Way, Cranberry  
(Subdivision Code) (Place-Political Subdivision)

Township, Pa 16066

in BUTLER County

[10]

(County Code)

on or about MAY 22, 2017 AND DATES THEREAFTER



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0080
Defendant Name:	First: CORRINA	Middle: DAWN	Last: HOGGARD

The acts committed by the accused are described below with each Act of Assembly or statute allegedly violated, if appropriate. When there is more than one offense, each offense should be numbered chronologically.

(Set forth a brief summary of the facts sufficient to advise the defendant of the nature of the offense(s) charged. A citation to the statute(s) allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section(s) and subsection(s) of the statute(s) or ordinance(s) allegedly violated. The age of the victim at the time of the offense may be included if known. In addition, social security numbers and financial information (e.g. PINs) should not be listed. If the identity of an account must be established, list only the last four digits. 204 PA.Code §§ 213.1 – 213.7.)

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input checked="" type="checkbox"/>	1	4117	(a)(2)	of the	18 PA C.S.	1	F-3		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **INSURANCE FRAUD**

Acts of the accused associated with this Offense: On or about May 22, 2017, and dates thereafter, the Actor and/or another for whom the Actor was legally accountable, knowingly and with the intent to defraud an insurer, namely Carefirst/Blue Cross Blue Shield and/or third party pharmaceutical benefits manager CVS Caremark, presented or caused to be presented to CVS Caremark any statement forming a part of or in support of any insurance claim that contained false, incomplete, or misleading information concerning any fact or thing material to the insurance claim, namely the Actor, presented various prescriptions for Schedule II and Schedule IV controlled substances, and non-controlled prescriptions to Rite Aid and Walgreens pharmacies which were paid by her insurance, CVS Caremark/ Carefirst/Blue Cross Blue Shield, purporting that they were properly prescribed and/or authorized by Dr. Gregory West, Dr. Mark Fennema and Dr. Mark Langhans, when in fact, the doctors did not prescribe and/or authorize such prescriptions.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	2	780-113	(a)(12)	of the	35 P.S.	1	F		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **VIOLATION OF THE CONTROLLED SUBSTANCE DRUG DEVICE COSMETIC ACT**

Acts of the accused associated with this Offense: On or about May 22, 2017 and dates thereafter, the Actor and/or another for whom the Actor was legally accountable, knowingly acquired or obtained possession of a controlled substance by misrepresentation, fraud, forgery, deception or subterfuge, namely, the Actor, on the aforementioned dates presented various prescriptions for Schedule II, controlled substances to pharmacies purporting that they were properly prescribed and/or authorized by Dr. Gregory West, Dr. Mark Fennema and Dr. Mark Langhans, when in fact, the doctors did not prescribe and/or authorize such prescriptions.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____					
<input type="checkbox"/>	3	780-113	(a)(12)	of the	35 P.S.	1	F		
Lead?	Offense #	Section	Subsection	PA Statute (Title)		Counts	Grade	NCIC Offense Code	UCR/NIBRS Code
PennDOT Data (if applicable)	Accident Number			<input type="checkbox"/> Interstate		<input type="checkbox"/> Safety Zone		<input type="checkbox"/> Work Zone	

Statute Description (include the name of statute or ordinance): **VIOLATION OF THE CONTROLLED SUBSTANCE DRUG DEVICE COSMETIC ACT**

Acts of the accused associated with this Offense: On or about May 22, 2017 and dates thereafter, the Actor and/or another for whom the Actor was legally accountable, knowingly acquired or obtained possession of a controlled substance by misrepresentation, fraud, forgery, deception or subterfuge, namely, the Actor, on the aforementioned dates presented various prescriptions for Schedule IV, controlled substances to pharmacies purporting that they were properly prescribed and/or authorized by Dr. Gregory West, Dr. Mark Fennema and Dr. Mark Langhans, when in fact, the doctors did not prescribe and/or authorize such prescriptions.



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0080
Defendant Name:	First: CORRINA	Middle: DAWN	Last: HOGGARD

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	4	4101	(a)(3)	of the	18 PA C.S.	1	M-1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **FORGERY**

Acts of the accused associated with this Offense: On or about May 22, 2017 and dates thereafter, the Actor, with the intent to defraud or with the knowledge that she was facilitating a fraud or injury to be perpetrated by anyone, did utter any writing so that it purported to be the act of another who did not authorize that act, namely, the Actor, and/or another for whom the Actor was legally accountable, did pass/fill numerous prescriptions for Schedule II controlled substances, Schedule IV controlled substances and non-controlled prescription medications, which were purported to be written and/or authorized by Dr. Gregory West, Dr. Mark Fennema and Dr. Mark Langhans, when in fact, the doctors did not prescribe and/or authorize such prescriptions.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	5	390-8	(13)(ii)	of the	63 P.S.	1	M		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **UNLAWFUL ACTS/PHARMACY ACT**

Acts of the accused associated with this Offense: On or about May 22, 2017 and dates thereafter, the Actor and/or another for whom the Actor was legally accountable, knowingly acquired or obtained possession of any drug by misrepresentation, fraud, forgery, deception or subterfuge, namely, the Actor, on the aforementioned dates presented various prescriptions for non-controlled prescription medications to pharmacies purporting that they were properly prescribed and/or authorized by Dr. Gregory West, Dr. Mark Fennema and Dr. Mark Langhans, when in fact, the doctors did not prescribe and/or authorize such prescriptions.

Inchoate Offense	<input type="checkbox"/> Attempt 18 901 A	<input type="checkbox"/> Solicitation 18 902 A	<input type="checkbox"/> Conspiracy 18 903	Number of Victims Age 60 or Older _____
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<input type="checkbox"/>	6	3922	(a)(1)	of the	18 PA C.S.	1	M-1		
Lead?	Offense#	Section	Subsection	PA Statute (Title)	Counts	Grade	NCIC Offense Code	UCR/NIBRS Code	
PennDOT Data (if applicable)		Accident Number			<input type="checkbox"/> Interstate	<input type="checkbox"/> Safety Zone	<input type="checkbox"/> Work Zone		

Statute Description (include the name of statute or ordinance): **THEFT BY DECEPTION**

Acts of the accused associated with this Offense: On or about May 22, 2017 and dates thereafter, the Actor, intentionally obtained or withheld property of another by deception, by creating a false impression, namely the Actor received approximately \$643.65 in prescription medications paid for by CVS Caremark/ Carefirst/Blue Cross Blue Shield by submitting various prescriptions to several pharmacies purporting that they were properly prescribed and/or authorized by Dr. Gregory West, Dr. Mark Fennema and Dr. Mark Langhans, when in fact, the doctors did not prescribe and/or authorize such prescriptions.



# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0080
Defendant Name:	First: CORRINA	Middle: DAWN	Last: HOGGARD

- I ask that a warrant of arrest or a summons be issued and that the defendant be required to answer the charges I have made.
- I verify that the facts set forth in this complaint are true and correct to the best of my knowledge or information and belief. This verification is made subject to the penalties of Section 4904 of the Crimes Code (18 Pa.C.S. § 4904) relating to unsworn falsification to authorities.
- This complaint consists of the preceding page(s) numbered 1 through 4.
- I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently that non-confidential information and documents.

The acts committed by the accused, as listed and hereafter, were against the peace and dignity of the Commonwealth of Pennsylvania and were contrary to the Act(s) of the Assembly, or in violation of the statutes cited.

(Before a warrant of arrest can be issued, an affidavit of probable cause must be completed, sworn to before the issuing authority, and attached.) 11-28-2018

SA. [Signature]  
(Signature of Affiant)

(Date) (Year)  
AND NOW, on this date 11-28-18 I certify that the complaint has been properly completed and verified.

An affidavit of probable cause must be completed before a warrant can be issued.

50-303  
(Magisterial District Court Number)

[Signature]  
(Issuing Authority)





# POLICE CRIMINAL COMPLAINT

Docket Number:	Date Filed: / /	OTN/LiveScan Number	Complaint/Incident Number IF-2018-0080
Defendant Name:	First: CORRINA	Middle: DAWN	Last: HOGGARD

## AFFIDAVIT of PROBABLE CAUSE

Date of Violation: May 22, 2017 and dates thereafter

Criminal Complaint No:

Name of Affiant: Special Agent David A. Dalcamo  
Narcotics Agent William Brown

Law Enforcement Agency: Pennsylvania Office of Attorney General  
Insurance Fraud Section  
Western Regional Office  
1251 Waterfront Place  
Pittsburgh, PA

Pennsylvania Office of Attorney General  
Bureau of Narcotics and Drug Control  
105 Independence Drive  
Butler, PA

- A. Your Affiant, David A. Dalcamo, has been employed as a Special Agent for the Pennsylvania Office of Attorney General, Insurance Fraud Section, Western Regional Office, since February 2016, and has been a Police Officer in this Commonwealth since 1998, is the case agent assigned to the investigation involving the Actor, Corrina Hoggard.

Your Affiant, William F. Brown, has been employed as a Narcotics Agent for the Pennsylvania Office Attorney General, Bureau of Narcotics Investigations and Drug Control (BNIDC), since February 2018 and has been with the Office of Attorney General for over 20 years as a criminal investigator. Affiant Brown was a Police Officer in the Commonwealth since 1987. Affiant Brown is the case agent assigned to the investigation involving the Actor, Corrina Hoggard.

The investigation revealed that the Actor, Corrina Hoggard, obtained schedule II controlled substances, schedule IV controlled substances, and non-controlled prescription medications by passing or filling fraudulent prescriptions at Rite Aid and Walgreens pharmacies. The Actor passed a total of 54 prescriptions, using her name and the name of her husband, Charles Hoggard. The prescriptions were not prescribed and/or authorized by Dr. Mark Fennema, Dr. Mark Langhans or Dr. Gregory West. The Actor used her CVS Caremark/ Carefirst/Blue Cross Blue Shield Insurance plan to pay for 19 of the prescriptions causing the insurance company to pay \$643.65.

- B. Narcotics Agent (NA) Stephanie McElhaney of the Commonwealth of Pennsylvania, Office of Attorney General, Bureau of Narcotics Investigation and Drug Control, initiated an investigation on the Actor. Your Affiants, along with NA McElhaney, collected prescriptions submitted by the Actor and filled at Walgreens and Rite Aid and using the Actor's CVS Caremark patient profile. These documents provided the following information:

1. Between May 22, 2017 and January 30, 2018 the Actor filled 42 prescriptions at either Walgreens or Rite Aid.
2. Thirty-two (32) prescriptions were allegedly prescribed by Dr. Gregory West and ten (10) were allegedly prescribed by Dr. Mark Fennema.
3. CVS Caremark covered eighteen (18) of the fraudulent prescriptions for the Actor totaling \$316.49.
4. The following chart shows the prescriptions in detail:

**POLICE CRIMINAL COMPLAINT**

Docket Number:	Date Filed: / /	OTN/LiveScan Number		Complaint/Incident Number IF-2018-0080
Defendant Name:	First: CORRINA	Middle: DAWN	Last: HOGGARD	

Medication	Quantity	Insurance Pay	Date of Service	Prescriber	Pharmacy
Hydrocodone-Acetaminophen 5-325	120		5/22/2017	West, Gregory	Walgreens
Hydrocodone/Acetaminophen 7.5-325	12		6/2/2017	Fennema, Mark	Walgreens
Hydrocodone/Acetaminophen 10-325	140		6/17/2017	West, Gregory	Walgreens
Oxycodone/Acetaminophen 10-325	180		7/5/2017	West, Gregory	Walgreens
Hydrocodone/Acetaminophen 10-325	60		8/2/2017	West, Gregory	Walgreens
Clonazepam 1mg	60		8/2/2017	West, Gregory	Walgreens
Oxycodone/Acetaminophen 10-325	80		8/9/2017	West, Gregory	Walgreens
Hydrocodone/Acetaminophen 7.5-325	12		8/15/2017	Fennema, Mark	Rite Aid
Oxycodone/Acetaminophen 10-325	100		8/19/2017	West, Gregory	Walgreens
Clonazepam 1mg	60	Cash	9/5/2017	West, Gregory	Walgreens
Ultram 50mg	180		9/14/2017	West, Gregory	Walgreens
Hydrocodone/Acetaminophen 10-325	180		9/25/2017	West, Gregory	Walgreens
Clonazepam 1mg	60		10/5/2017	West, Gregory	Walgreens
Oxycodone/Acetaminophen 7.5-325	18		10/23/2017	Fennema, Mark	Walgreens
Hydrocodone/Acetaminophen 10-325	180		10/26/2017	West, Gregory	Walgreens
Clonazepam 1mg	120		11/13/2017	West, Gregory	Walgreens
Hydrocodone/Acetaminophen 10-325	60	Cash	11/28/2017	West, Gregory	Walgreens
Oxycodone/Acetaminophen 7.5-325	16	Cash	12/5/2017	Fennema, Mark	Walgreens
Hydrocodone-Acetaminophen 10-325	60	Cash	12/8/2017	West, Gregory	Walgreens
Duloxetine HCL 60mg	10	\$ 8.27	12/14/2017	West, Gregory	Walgreens
Losartan/Hctz 100/25mg tab	30	\$ 3.69	12/14/2017	West, Gregory	Walgreens
Baclofen 10mg	30	\$ 26.58	12/14/2017	West, Gregory	Walgreens
Clonazepam 1mg	30	\$ 4.34	12/14/2017	West, Gregory	Walgreens
Oxycodone/Acetaminophen 10-325	4	\$ 14.86	12/14/2017	West, Gregory	Walgreens
Adderall XR 30mg	30	\$ 139.89	12/15/2017	West, Gregory	Walgreens
Hydrocodone/Acetaminophen 10-325	10	\$ 12.63	12/15/2017	West, Gregory	Walgreens
Oxycodone-Acetaminophen 7.5-325	24	Cash	12/23/2017	Fennema, Mark	Rite Aid
Duloxetine HCL 60mg	10	\$ 8.27	12/26/2017	West, Gregory	Walgreens
Hydrocodone/Acetaminophen 10-325	10	\$ 10.29	12/29/2017	West, Gregory	Walgreens
Amox-Clav 500mg	10	\$ 12.14	1/2/2018	Fennema, Mark	Walgreens
Tizanidine 4mg	30	\$ 23.70	1/3/2018	West, Gregory	Walgreens
Gabapentin 300mg	20	\$ 6.33	1/6/2018	West, Gregory	Walgreens

**POLICE CRIMINAL COMPLAINT**

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Hydrocodone/Acetaminophen 7.5-325	60	Cash	1/6/2018	West, Gregory	Walgreens
Duloxetine HCL 60mg	10	Cash	1/8/2018	West, Gregory	Walgreens
Oxycodone/Acetaminophen 7.5-325	5	\$ 16.56	1/11/2018	West, Gregory	Walgreens
Oxycodone/Acetaminophen 10-325	3	\$ 10.10	1/15/2018	Fennema, Mark	Walgreens
Hydrocodone/Acetaminophen 10-325	4	\$ 4.79	1/18/2018	Fennema, Mark	Walgreens
Clonazepam 1mg	30	\$ 4.47	1/19/2018	West, Gregory	Walgreens
Duloxetine HCL 60mg	10	Cash	1/19/2018	West, Gregory	Walgreens
Hydrocodone/Acetaminophen 10-325	4	\$ 4.79	1/22/2018	Fennema, Mark	Walgreens
Duloxetine HCL 60mg	10	Cash	1/29/2018	West, Gregory	Walgreens
Hydrocodone- Acetaminophen 10-325	6	\$ 4.79	1/30/2018	Fennema, Mark	Rite Aid
		\$ 316.49			

C. Your Affiants, along with NA McElhaney, collected prescriptions submitted by the Actor in the name of her husband, Charles Hoggard, and filled at Walgreens and Rite Aid using his CVS Caremark patient profile. These documents provide the following information:

1. Between June 29, 2017 and January 1, 2018 the Actor filled 12 prescriptions in her husband's name at Walgreens.
2. Nine (9) prescriptions were allegedly prescribed by Dr. Gregory West; two (2) prescriptions were allegedly prescribed by Dr. Mark Langhans; and one (1) was allegedly prescribed by Dr. Mark Fennema.
3. CVS Caremark covered nine (9) of the fraudulent prescriptions for Charles Hoggard totaling \$327.16
4. The following chart shows the prescriptions in detail:

Medication	Quantity	Insurance Pay	Date of Service	Prescriber	Pharmacy
Norco 5.0-325mg Tab	80		6/29/2017	Langhans, Mark	Walgreens
Hydrocodone/Acetaminophen 7.5-325mg	60		10/14/2017	Langhans, Mark	Walgreens
Fluoxetine 40mg	30	Cash	12/8/2017	West, Gregory	Walgreens
D-Amphetamine Salt Com ER (XR) 30mg	30	\$ 139.89	12/14/2017	West, Gregory	Walgreens
Ondansetron 8mg	60	\$ 24.48	12/14/2017	West, Gregory	Walgreens
Alprazolam 0.5 mg	90	\$ 3.21	12/26/2017	West, Gregory	Walgreens
Hydrocodone/Acetaminophen 10-325mg	20	\$ 4.81	12/26/2017	West, Gregory	Walgreens
Amoxicillin 500mg	20	\$ 12.14	1/2/2018	Fennema, Mark	Walgreens
Hydrocodone/Acetaminophen 10-325mg	30	\$ 5.75	1/2/2018	West, Gregory	Walgreens
Hydrocodone/Acetaminophen 10-325mg	60	\$ 10.60	1/25/2018	West, Gregory	Walgreens

**POLICE CRIMINAL COMPLAINT**

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D-Amphetamine Salt Com ER (XR) 30mg	30	\$ 122.99	1/25/2018	West, Gregory	Walgreens
Alprazolam 0.5mg Tab	90	\$ 3.29	1/25/2018	West, Gregory	Walgreens
		\$ 327.16			

D. Abby Craigmyle of Cox Health, Springfield, MO, provided Affiant Dalcamo the following information:

1. Abby Craigmyle is the Assistant Compliance Officer for Cox Health.
2. Craigmyle indicated that Dr. Gregory West resigned from Cox Health on December 6, 2017.
3. Craigmyle stated that both the Actor and Charles Hoggard were patients of Dr. Gregory West.
4. Craigmyle was able to review the list of prescriptions presented to Walgreens and Rite Aid and was able to identify all that would not have been issued by Dr. West.
5. Craigmyle indicated that the last time the Actor was seen in the office by Dr. West was August 19, 2016.
6. The last prescription issued to the Actor was for Hydrocodone and/or Oxycodone was on December 8, 2016.
7. Based on the medical records for the Actor on file at Cox Health, Craigmyle indicated that the prescriptions on the list provided for their review were fraudulent.
8. In reference to Charles Hoggard, Craigmyle indicated that the last time Charles Hoggard was seen by the doctor was July 15, 2016.
9. The last time Charles Hoggard was issued a prescription was on December 12, 2016.
10. Based on Charles Hoggard's medical records on file at Cox Health, Craigmyle indicated that the prescriptions on the list provided for their review were fraudulent.

E. Affiant Dalcamo conducted an interview with Dr. Gregory West, who provided the following information:

1. West was advised of the investigation and was able to review the prescriptions that contained his signature.
2. West stated that the signature contained on the prescriptions was not his signature.
3. West also stated that the fraudulent prescriptions were printed incorrectly. West stated that he worked for the Diagnostic Clinic, which is located at 3800 South National Avenue, in Springfield, MO. The prescription had the address of 960 East Walnut Lawn St. Suite 201, Springfield, MO. West stated the Walnut Lawn address is for the Endocrinology office.
4. West confirmed while he was employed by Cox Health his prescription would have printed the South National Avenue address.
5. West confirmed that all the prescriptions listed for the Actor and/or Charles Hoggard were fraudulent.

F. Affiant Dalcamo conducted an interview with Matt Duff, University of Pittsburgh Medical Center Police Department, who provided the following information:





# POLICE CRIMINAL COMPLAINT

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1. Duff was supplied a list of the prescriptions purportedly prescribed by Dr. Mark Fennema and filled by the Actor.
2. Duff did speak directly to Dr. Mark Fennema and researched the UPMC data base. Duff verified that ten (10) prescriptions in the Actors' name were not valid and were not authorized by Dr. Fennema.
3. Duff verified that Dr. Mark Fennema is currently an emergency room physician at the UPMC Passavant facility in Cranberry Township, Butler County, Pennsylvania.

G. Agent McElhaney contacted Heather Malacki, the clinical manager at Tri-State Orthopedics & Sports Medicine who provided the following:

1. The prescriptions that were allegedly written for Charles Hoggard were not written by Dr. Mark Langhans and were not valid.
2. Their prescriptions, if written on a pad, are not in that format, and the signature is not Dr. Langhans signature.
3. Dr. Langhans reviewed the prescriptions and also confirmed that he did not write or authorize the prescription.

H. Affiant Dalcamo and Affiant Brown conducted an interview with the Actor, who provided the following information:

1. The Actor was advised of the investigation and agreed to answer questions concerning the fraudulent prescription and insurance claims.
2. The Actor indicated that she was aware of the investigation into her passing fraudulent prescriptions.
3. The Actor admitted she filled numerous prescriptions for several medications, including Schedule II narcotics, with prescriptions that were not authorized by the above named doctor(s).
4. Affiant Dalcamo advised the Actor that fifty four (54) of the prescriptions had been verified by Dr. Mark Fennema, Dr. Gregory West, and Dr. Mark Langhans, as being fraudulent, in her name and in the name of her husband, Charles Hoggard. The Actor advised that she presented the prescriptions at the pharmacies and received the medications for herself and in the name of her husband.
5. The Actor stated that she is not the individual that produced the prescriptions; however, she purchased the prescriptions from a person she only knows by the name "Laura".
6. The Actor stated that in 2014 she had several surgeries on her abdomen resulting in the doctor at the time prescribing her pain medication.
7. The Actor admitted that she became addicted to the medication.
8. In the fall of 2016 she and her family moved from Springfield, Mo, back home to the Wexford, PA area.
9. In early 2017, the Actor went to the emergency department at the University of Pittsburgh Medical Center, Passavant in Cranberry Township. After being treated she was leaving the hospital room and realized that she left something. She returned to the room and was approached by another woman that she could only identify as "Laura".



# POLICE CRIMINAL COMPLAINT

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Defendant Name:	First: CORRINA	Middle: DAWN	Last: HOGGARD

10. Laura suggested to the Actor that she could get her the prescriptions and all the Actor would need to do is pay her (Laura) the co-pay she would normally pay the hospital.
  11. From this point, the Actor traded text messages with Laura which led to the Actor meeting Laura in the parking lot of UPMC Cranberry. The Actor paid Laura \$50.00 and received the requested prescriptions.
  12. The Actor admitted that she would meet Laura three (3) to four (4) times a month and pay her \$50.00 in cash for the prescriptions.
  13. The Actor stated that she knew this was not legal and the prescriptions were fraudulent, but she got them because she had to, due to her addiction.
  14. The Actor admitted to using her medical insurance, prescription plan, CVS Caremark to obtain some of the prescriptions.
- I. Affiant Dalcamo spoke with Bradley Borowski, Clinical, Comprehensive Fraud, Waste and Abuse Advisor for CVS Caremark who provided the following information:
1. CVS Caremark is the third-party prescription provider for Carefirst/Blue Cross Blue Shield.
  2. CVS Caremark/ Carefirst/Blue Cross Blue Shield would not have paid for the prescriptions that were forged had they known that they were not authorized by a doctor.

Based upon the information set forth above, your Affiants believe that there is probable cause for the issuance of an arrest warrant for the Actor, Corrina Hoggard.



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Defendant Name:	First: CORRINA	Middle: DAWN	Last: HOGGARD

I, SA DAVID A. DALCAMO/ NA WILLIAM BROWN, BEING DULY SWORN ACCORDING TO THE LAW, DEPOSE AND SAY THAT THE FACTS SET FORTH IN THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

I CERTIFY THAT THIS FILING COMPLIES WITH THE PROVISIONS OF THE CASE RECORDS PUBLIC ACCESS POLICY OF THE UNIFIED JUDICIAL SYSTEM OF PENNSYLVANIA THAT REQUIRE FILING CONFIDENTIAL INFORMATION AND DOCUMENTS DIFFERENTLY THAN NON-CONFIDENTIAL INFORMATION AND DOCUMENTS.

SA David Dalcamo / NA William Brown  
(Signature of Affiant)

Sworn to me and subscribed before me this 28<sup>th</sup> day of Nov. 2018  
11-28-18 Date William Brown, Magisterial District Judge

My commission expires first Monday of January, 2024

